

Technical Assistance Q & As

Is there a standardized One-Stop Operator Monitoring Tool available to LWDAs?

Due to Local Workforce Development Boards (LWDBs) having discretion as to what to include in the contract, as long as they meet WIOA requirements as stated in the Department of Labor TEGL 15-16, the OSO contracts can vary and currently there is not a standard OSO Monitoring Tool.

Can stipends be provided to Youth participants for completing job readiness career exploration activities?

These payments are not allowable, as they are services that provide labor market information (LMI) and are not directly linked to a training activity or Work Experience (WEX).

When case managers time charge, do they need to track In-School Youth (ISY) and Out-of-School Youth (OSY) separately?

When charging time to Youth funds, case managers should charge to ISY and OSY when time can be appropriately split.

Transferring of Funds

Must “Base funds (PY)” and “Advance funds (FY)” be treated separately when requesting AD-DW transfers?

Yes. Due to being separately allocated grants from DOL, Base/PY and Advance/FY funds must continue to be treated as separate allocations when requesting transfers. The transfers of Base/PY and Advance/FY funds may be requested in one consolidated request.

Can funds be transferred between “Base funds (PY)” and “Advance funds (FY)”?

No, funds cannot be transferred between Base/PY & Advance/FY due to being separate allocations.

Regarding Fiscal Policies Sec. 401.01(E) and the recommended reserve of Rapid Response funds, do local areas have flexibility to reserve funds to align with anticipated needs?

Sec 401.01

E. LWDAs must reserve a percentage of Rapid Respond funds for Rapid Response activities:

Recommended Reserve under each Grant Allocation:

- | | |
|---------------------------|-----|
| • At the end of 12 months | 50% |
| • At the end of 18 months | 25% |
| • At the end of 24 months | 0% |

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Yes, these are recommendations and the local areas have flexibility regarding amounts to reserve. If other conditions for a transfer are met (funds are available for transfer and DW funds are fully expended when requesting a transfer of RR), the RR funds may be transferred to DW in advance of the recommended reserve levels to meet service needs.

What are allowable rental costs under “sale and lease back” arrangements and “less-than-arm’s-length” leases?

Guidance is provided at 2 CFR 200.465, Rental Costs of Real Property and Equipment.

“Rental costs under “sale and lease back” arrangements are allowable only up to the amount that would be allowed had the non-Federal entity continued to own the property. This amount would include expenses such as depreciation, maintenance, taxes, and insurance.”

“Rental costs under “less-than-arm's-length” leases are allowable only up to the amount (as explained in paragraph (b) of this section). For this purpose, a less-than-arm's-length lease is one under which one party to the lease agreement is able to control or substantially influence the actions of the other.”

Do Youth Admin costs need to be tracked separately for ISY and OSY?

Per DOL TEGL 23-14, State and Local area administrative expenditures are not a part of the 75 percent OSY minimum expenditure calculation. Further, the 75 percent expenditure rate is a minimum requirement, local areas may spend up to 100 percent of their youth funds on OSY, if they choose.

Is the 20% expenditure for WEX based on program funding allocation or total Youth allotment?

Per 20 CFR 681.590, the 20% WEX requirement does not apply to the admin portion of YT funds.

Is the 20% expenditure for WEX a monthly target or fiscal?

To allow flexibility in program design, the 20% WEX expenditure requirement is not a monthly goal.

Does the accrual basis of accounting need to be used?

20 CFR sub-part C 683.300 (5) – Reporting Requirements: “Reported expenditures, matching funds, and program income, including any profits earned, must be reported on the accrual basis of accounting and cumulative by the fiscal year of appropriation.”

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Are there limitations to the type of Legal Aid offered under the program?

Although legal aid services are allowable as support services under 20 CFR 680.900(h), “support services may only be provided when they are necessary to enable individuals to participate in career service or training activities.” (20 CFR 680.910).

Can program costs be allocated for the month based on the client counts from previous months?

Yes, this methodology may be used within the broad guidelines in 2 CFR 200, App. V – State/Local Government-Wide Central Service Cost Allocation Plans.

Costs subject to cost allocation, both program and personal, are to be allocated according to a consistent methodology, which best measures the relative benefit derived by the program. Documentation must be available to justify the methodology used.

May WIOA Title I funds be used to pay for fingerprinting and/or background checks for Youth Work Experience employers and Adult Mentors?

Yes, these are allowable expenses and best classified as program costs due to the sole purpose role of Adult Mentors and Youth Work Experience employers.

Can Adult (AD) Administrative costs be charged to the Dislocated Worker (DW) Administrative fund source?

Yes, the ten percent reserved for local administrative costs may be used for administrative costs for the Adult, Dislocated Worker, or Youth programs per 20 CFR 683.205. Please note that expenditures must still be reported under their respective grants.

Must the LWDA apply to utilize for the Hold Harmless Provision?

No, the invocation of the provision is determined by statute 20 CFR 683.125.

Are a trainee's tips payable as part of the employer cost for On-the-Job Training (OJT)?

No, tips are not an employer cost and are not allowable to be paid with WIOA Title I funds.

Can WIOA Title I funds be used to purchase office furniture?

Yes, furniture is allowable as an administrative cost, provided there is a direct benefit to the program.

Must the USDOL tagline be included on outreach and public relations materials, as well as on promotional items?

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Yes, continue to include the DOL tagline on outreach materials/promotional items and document how the item of cost benefits the performance of the grant to ensure compliance with 2 CFR 200.421(e)(4).

Are the expenditures for monitoring the Eligible Training Providers (ETPs) and approving programs for the Eligible Provider Training List (ETPL) classified as administrative costs?

Yes, the expenditures for monitoring and approval of ETPs and programs are classified as administrative costs.